

As the Radio Amateur Service is a dedicated non-profit service that provides their community with free services for community events and emergency communications it is only fair that the cost of conversion, including, the development of new equipment, new parts, and test equipment be paid for by the commercial interests who seek to occupy a band currently assigned to the Amateur Radio Service. Amateur Radio Operators can least afford the cost of spectrum reassignments that benefit commercial interests.

The selling of Amateur Radio spectrum to commercial interests is the equivalent of selling our National Parks for land development. The Commission needs to establish a compensation plan for Amateur Radio Operators to protect their investment of equipment purchased, or constructed, that is made obsolete by spectrum adjustments. Just as we have set aside land for National Parks, we need to set aside spectrum for the Amateur Radio Service.

Commissioners before you in their ultimate wisdom, created the Amateur Radio Service to pioneer Radio Technology. Amateur Radio has in turn, provided our Country with many developments in the Radio Art, and millions of man hours of volunteer community service. Because we are non-commercial, we have enjoyed the protection of the Commission in the past, as a National Resource, and with the expanding of the technology Amateur Radio helped to pioneer, we need your protection from large commercial interests.

The 70 cm band is subject to ducting from the temperature inversion layer that blankets Southern California for 6-8 months of the year. This creates interference problems by providing path communications in the coastal areas of the cities of San Diego, Los Angeles and Santa Barbara. At times signals from other cities will capture local repeaters in the coastal areas where most of the population lives and works. Ducting is most intense in the lower part of the UHF and the higher part of the VHF spectrum. An assignment above the 23 cm band for land mobile use would allow better utilization of the current available spectrum in Southern California.

The Amateur Radio Service is able to tolerate interruptions of communication on the 70 cm band from Government Radio Location Services (RADAR). Assigning this band to Land Mobile Service will bring forth a endless number of complaints from U.S. Navy activities off our coast that also share the same ducting Phenomena and the 70 cm band as a primary user.

Two years ago I was able to make a two way Television NTSC contact on 10,400 MHz. between San Diego and Santa Barbara (204 mile path) using less than 1 Watt of power with both antennas at less than 300 Feet above sea level. Ducting does work very well in Southern California!

Sincerely,



Art McBride, KC6UQH

cc: ARRL

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May 18, 1998

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Secretary, Federal Communication Commission
1919 M. Street NW
Washington, DC 20554

RE: RM 9267

Dear Sir,

My amateur radio call sign is N6JOJ, I am writing this letter to urge you to reject the "demand" for reallocation of the 70 centimeter spectrum to the private commercial use. While no amateur likes to lose any of the spectrum currently available to us, we have a particular reason for objecting to this commercial demand. Many of us are members of volunteer organizations such as ARES And RACES which regularly respond to requests for communication assistance in times of local disaster. In such cases, we provide backup communications between the scene of the disaster and local area hospitals which have agreed to receive and treat victims of such disasters.

I am also a member of the San Diego Humane Society's Animal Rescue Unit which responds to all large wildland fires here in San Diego county. We depend heavily on the repeater interlinks between the 2 meter and 70 centimeter bands to maintain communication with our units behind the fire lines.

Our ability to safely support these activities will be seriously damaged if RM 9267 is approved and I therefore respectfully request that you deny this request.

Sincerely,



Tom Myrick (N6JOJ)

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Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

In the Matter of)
)
An Allocation of Spectrum for)
Private Mobile Radio Services) RM-9267
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To: The Secretary,
Federal Communications Commission

STATEMENT OF OPPOSITION TO RM-9267

I am writing in opposition to the Land Mobile Communications Council's proposal to re-allocate the 420-430 MHz and 440-450 MHz frequency spectrum to commercial, private, land mobile applications. Instead, I ask that the Commission change the Amateur allocation from secondary to co-primary with the U.S. government. Prior to the Cold War era, the Amateur Radio Service was a primary status user of these frequencies. With the tremendous success of the modern "no code" Technician license and the high growth of Amateur UHF operations, now is the time to restore Amateur Radio's historic primary status within the 420-450 MHz band.

The 420-450 MHz Amateur allocation is the second most used Amateur VHF/UHF band. The LMCC has requested "sharing" this band with Amateur operations yet provides no explanation for how "sharing" might occur. Based on the history of "sharing" with commercial services (particularly the example of AVL companies "sharing" 902-928 MHz who ordered hams off the air), "sharing" means that Amateur operations will be evicted from the band. This is what happens when commercial, for profit services "share" with not-for-profit, community service oriented Amateur Radio operations.

Amateur Radio has and will continue to share its VHF/UHF allocations with *mutually compatible* services and operations. These have included, the U.S. government, the U.S. military, NOAA doppler wind shear radar and other government radiolocation services. Amateur Radio has a long and proud history of supporting the U.S. armed forces and NOAA through the National Weather Service's SkyWarn system. For these reasons, there is a *mutual interest in sharing between compatible services* like Amateur Radio and the U.S. government. However, there are *no mutual interests* in common with for-profit private land mobile

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services; "sharing", as in the AVL example, will result in the loss of 420-430 and 440-450 MHz by the Amateur service, which will prove devastating to the mission of the Amateur Radio service.

Many government agencies and non-profit disaster relief organizations would be tremendously harmed by the loss of the Amateur 420-430 and 440-450 MHz allocations. The following is a partial list of agencies that I have assisted with providing emergency communications via Amateur Radio using the 420-450 MHz band:

- Los Angeles County Disaster Communication Service

Private and for-profit radio services do not have mutually compatible interests with the Amateur Radio Service. Sharing between private land mobile and the Amateur Radio Service, as proposed by the LMCC, will not work. The 420-450 MHz band is the second most used VHF/UHF Amateur Radio allocation. The loss of these frequencies will cause severe disruption to the mission of Amateur Radio, as specified in C.F.R. Title 47 Part 97.1, and will render severe harm to the Amateur's ability to support numerous government and non-profit relief agencies.

I respectfully request that you DENY the request of the LMCC to share the Amateur radio allocations at 420-430 and 440-450 MHz. Instead, I request that the Commission restore Amateur Radio's historic co-primary status in the entire band 420-450 MHz.

Sincerely,



Stuart Sokolin
4300 Empress Ave
Encino, CA 91436

May 24, 1998

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RM-9267

Federal Communications Commission
Office of the Secretary
Room 222
1919 M Street NW
Washington DC 20554

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Re: Opposition to RM-9267 Land Mobile Communications Council Petition For 70 CM

Dear Sir:

Recently the Land Mobile Communications Council filed a petition with you, RM-9267, that seeks to reallocate the frequency bands 420-430 and 440-450 MHz. for use of the Private Mobile Radio Service. It is my understanding that this new rule is yet another attempt of the private sector to obtain more frequencies at the expense of the Amateur Radio allotments.

I operate a major network in the Pacific Northwest with 500 registered users. We have links to all points of the State including Western Washington and to the neighboring States of Idaho, and Oregon. It makes possible a single system of mobile and base communication coverage extending beyond the limited range provided by any single repeater operation. The FM repeaters operate in the VHF and UHF frequency area. My Amateur neighbors have an even larger network with some 27 Two meter repeaters linked together with the UHF band. Another excellent system operates via a Simplex system that links Two Meters with the 440 MHz. band enabling communication from Eastern to Western Washington State. Several Amateurs use this system daily.

The primary purpose of these systems are to provide emergency and public service communication within this area. A very long list of uses include: The 1980 Mt. St. Helen's eruption, Fire storm in 1991, Ice storm in 1996 and search and rescue operations in mountainous areas.

Many VHF Amateur systems use the UHF band to function, even as a single repeater. In many cases these single repeaters are connected together using the UHF band. The reallocation proposed by the LMCC is incompatible with these operations and would destroy most of these Amateur systems. Several Packet Clusters would also be affected. You have a lot of really upset VOTING citizens with their attention on this matter.

Please consider that the Amateur frequencies are public property and a non renewable resource. Having the private sector obtain these frequencies will only solve their problems short term. They need to put their efforts into more efficient use of the spectrum they already have.

Please tell the private sector to look to the channels that are currently under used by their own kind. I would also suggest they look at developing better technology to allow more operational channels because that's the real solution. When all the frequencies are gone, that's where they will find themselves anyway.

For the above reasons, I hope you will not allow the reallocation of these frequencies. I appreciate your attention in this matter.

Respectfully,

John P. Vocht

John P. Vocht - KA7DRE

1305 E. Paradise Loop

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